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Re-evaluation Note REV2010-03

Aluminum and Magnesium Phosphide

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The purpose of this Re-evaluation Note is to notify registrants, pesticide regulatory officials and the Canadian public of the current status of the re-evaluation of aluminum and magnesium phosphide.

In 2007, Health Canada's Pest Management Regulatory Agency (PMRA) requested, through its Re-evaluation Note REV2007-06, *Aluminum and Magnesium Phosphide Interim Measures* that measures be implemented to further protect workers and bystanders in the vicinity of areas treated with aluminum and magnesium phosphide. These measures included the development of a product stewardship program stipulating that a fumigation management plan is required from users prior to any fumigation with metal phosphides or phosphine gas. As part of this measure, registrants were required to develop a guidance document for users on how to prepare a fumigation management plan. These measures also included lowering the current phosphine gas exposure limit (in other words, the re-entry level) of 0.3 ppm to the lowest practical level. REV2007-06 also identified outstanding toxicology and occupational exposure data. These data requirements were to be confirmed by the PMRA once the index of all existing toxicology and exposure data requested in REV2007-06 had been reviewed.

A fumigation management plan guidance document has been submitted by registrants and approved by the PMRA. This document is to be incorporated into the Applicator's Manual attached to the product label.

Based on a review of currently available information, a reduction of the phosphine gas exposure limit from 0.3 ppm to 0.1 ppm can be supported as an interim measure. The label of products containing aluminum and magnesium phosphide and the fumigation management plan guidance document will need to be revised to include the new re-entry level. In the long-term, the PMRA believes that efforts should be made by registrants towards improving the technologies that would a) further decrease detection limits in the field, and b) provide means to further reduce human exposure.

Upon reviewing the index of available data that was submitted, the PMRA can now confirm that the ambient air monitoring study identified in REV2007-06 is required. The study must be representative of typical fumigated sites and of Canadian climatic conditions. It is recommended that the registrant consult with the PMRA on the protocol to be used for the air monitoring study because the protocol must be approved by the PMRA prior to study initiation.

At this time, the PMRA will continue to work with registrants on developing a strategy to address outstanding toxicology data (as outlined in REV2007-06) as well as methods for improving technologies to further reduce human exposure.

Registrants have recently submitted an incident report to the PMRA, which involves use of rodenticides containing aluminum phosphide in residential areas in the United States. The PMRA will consider this information in the on-going re-evaluation and has required that use of rodenticides be strictly prohibited in residential areas in Canada, and that application is a least 500 metres away from any residential areas or buildings.

It should be noted that Canadian registered products containing phosphine gas as the main active ingredient for use as a fumigant are also subject to the above regulatory actions. Registrants will be required to amend their labels to reflect these interim measures.